UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY AVERAGE WHOLESALE PRICE LITIGATION MDL No. 1456 Master File No. 1:01-CV-12257-PBS Sub-Category Case No. 1:08-CV-11200

THIS DOCUMENT RELATES TO:

United States ex rel. Linnette Sun and Greg Hamilton, Relators

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Baxter Healthcare Corporation

Judge Patti B. Saris

DECLARATION OF TINA D. REYNOLDS IN SUPPORT OF BAXTER HEALTHCARE CORPORATION'S MOTION TO COMPEL RESPONSE TO INTERROGATORY AND THE PRODUCTION OF DOCUMENTS

- I, Tina Reynolds, duly declare under penalty of perjury as follows:
- 1. I am an attorney at law admitted to practice in the State of North Carolina and the District of Columbia and a Counsel in the law firm of Dickstein Shapiro LLP, counsel for Defendant Baxter Healthcare Corporation ("Baxter"). I am familiar with all of the facts and circumstances herein. I make this declaration in support of Baxter's Motion to Compel Responses to Interrogatories and the Production of Documents in the above-captioned action.
- 2. Attached hereto as Exhibit A is a true and correct copy of Baxter Healthcare Corporation's August 9, 2011 First Set of Interrogatories to Linnette Sun.
- 3. Attached hereto as Exhibit B is a true and correct copy of Baxter Healthcare Corporation's August 9, 2011 First Set of Requests for the Production of Documents to Linnette Sun.
- 4. Attached hereto as Exhibit C is a true and correct copy of Relator Linnette Sun's September 8, 2011 Objections and Responses to Baxter's First Set of Interrogatories.

- 5. Attached hereto as Exhibit D is a true and correct copy of Linnette Sun's October 13, 2011 cover document for her production of documents in response to Baxter's First Set of Requests for Production of Documents.
- 6. Attached hereto as Exhibit E is a true and correct copy of the October 20, 2011 letter from Baxter's counsel to Relators' counsel notifying them of deficiencies in the Sun production and interrogatory responses.
- 7. Attached hereto as Exhibit F are true and correct copies of representative examples of emails that are missing attachments from Sun's October 13, 2011 document production.
- 8. Attached hereto as Exhibit G are true and correct copies of representative examples of emails referring to Sun's consulting work from Sun's October 13, 2011 document production.
- 9. Attached hereto as Exhibit H are true and correct copies of LS-DFP1- 503 through 504 from Sun's October 13, 2011 document production.
- 10. Attached hereto as Exhibit I is a true and correct copy of LS-DFP1-000110 from Sun's October 13, 2011 document production.
- 11. Attached hereto as Exhibit J are true and correct copies of LS-DFP1-111 through 113 from Sun's October 13, 2011 document production.
- 12. Attached hereto as Exhibit K is a true and correct copy of a November 2, 2011 email from me to Lauren Udden, counsel for Relators, copying his co-counsel Mark Kleiman.

I hereby swear that the foregoing statements are true to the best of my knowledge, information, and belief.

Dated: November 4, 2011

/s/ Tina Reynolds

Tina Reynolds

DICKSTEIN SHAPIRO LLP

1825 Eye Street NW Washington, DC 20006

Telephone: (202) 420-2200 Facsimile: (202) 420-2201

Counsel for Defendant Baxter Healthcare Corporation

CERTIFICATE OF SERVICE

I hereby certify that I, Tina D. Reynolds, an attorney, caused a true and correct copy of the foregoing DECLARATION OF TINA D. REYNOLDS IN SUPPORT OF BAXTER HEALTHCARE CORPORATION'S MOTION TO COMPEL RESPONSES TO INTERROGATORIES AND THE PRODUCTION OF DOCUMENTS to be delivered to all counsel of record by electronic service via LexisNexis File & Serve, on November 4, 2011, for posting and notification to all parties.

/s/ Tina D. Reynolds

Tina D. Reynolds

DICKSTEIN SHAPIRO LLP

1825 Eye Street NW

Washington, DC 20006

Telephone: (202) 420-2200